

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JIMMIE LEWIS,	)	
	)	
Plaintiff,	)	
	)	CONSOLIDATED
v.	)	C.A. No. 05-013-GMS
	)	C.A. No. 05-051-GMS
	)	C.A. No. 05-052-GMS
WARDEN RAPHAEL WILLIAMS, et al.,	)	
	)	Jury Trial Requested
Defendants.	)	

**STATE DEFENDANT WARDEN RAPHAEL WILLIAMS' RESPONSES  
TO PLAINTIFF'S REQUEST FOR ADDRESSES [RE: D.I. 100 & 102]**

Pursuant to the Federal Rules of Civil Procedure and the Court's Order dated April 9, 2007 (D.I. 102), State Defendant Warden Raphael Williams ("Warden Williams") hereby responds to Plaintiff's request for addresses in his Motion for Discovery (D.I. 100) as follows:

**RESPONSE TO REQUEST FOR ADDRESSES**

**Provide last known addresses for the following individuals: Dr. Joshi, Archie Armstrong, Mr. Fish, Mack Reynolds, Aaron Goines, C/O Cumberback, C/O Harriford, C/O Presley, Lt. Mitchell, Nanette Bordley, Tamiko Chaffer, C/O Hardgrave, Diane Hernandez, Ms. Newman, Dr. Boston, Dr. Ali, Georgia Sutton, and Nurse Inna.**

**RESPONSE:** State Defendant Warden Williams states as follows:

1. Upon information and belief, Dr. Joshi, Mr. Fish, Diane Hernandez, Dr. Boston, Dr. Ali, Georgia Sutton and Nurse Inna were not employees of Howard Young or DCC. Rather, the aforementioned individuals were employees of the contracted medical provider. The aforementioned individuals no longer work at Howard Young or DCC and neither Howard Young nor DCC maintained personnel files on these individuals. Therefore, there are no known addresses for these individuals.
2. Records indicate that there are no known individuals by the names of Aaron Goines or Mack Reynolds who worked for Howard Young or DCC.

3. Upon information and belief, the following individuals are currently employed by the Department of Correction:

Lt. John Mitchell  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

C/O Tamiko Schaffer  
Webb Correctional Facility  
200 Greenbank Road  
Wilmington, DE 19808

4. Last known addresses of former employees of Howard Young:

Archie Armstrong  
228 Flower Street  
Chester, PA 19013

William Harriford  
816 Townsend Boulevard  
Dover, DE 19901

Annette Newman  
1605 Bonwood Rd.  
Alban Park  
Wilmington, DE 19805

Charles Pressley  
1251 S. Peach Street  
Philadelphia, PA 19143

5. Upon information and belief, last known addresses of former employees of DCC:

Nanette Bordley  
P.O. Box 1033  
Dover, DE 19903

Amanda Cumberbatch  
15 Hogan Circle  
Middletown, DE 19709

Gwen Hargreaves  
RR2 Box 150-20  
Frankford, DE 19945

**DEPARTMENT OF JUSTICE  
STATE OF DELAWARE**

/s/ Erika Y. Tross

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Erika Y. Tross (#4506)  
Deputy Attorney General  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400  
Attorney for the State Defendants

Dated: April 17, 2007

**CERTIFICATE OF SERVICE**

I, Erika Y. Tross, Esq., hereby certify that on April 17, 2007, I caused a true and correct copy of the attached *State Defendant Warden Raphael Williams' Responses to Plaintiff's Request for Addresses [Re: D.I. 100 & 102]* to be served on the following individual in the form and manner indicated:

**NAME AND ADDRESS OF RECIPIENT(S):**

Inmate Jimmie Lewis  
SBI # 506622  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

**MANNER OF DELIVERY:**

- ☐ One true copy by facsimile transmission to each recipient
- ☒ Two true copies by first class mail, postage prepaid, to each recipient
- ☐ Two true copies by Federal Express
- ☐ Two true copies by hand delivery to each recipient

/s/ Erika Y. Tross  
Erika Y. Tross (#4506)  
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